



School District of Philadelphia  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

*Transmitted via Electronic Mail*

Ms. Kyla L. Townsend-McIntyre  
U.S. Environmental Protection Agency, Region III  
Pesticides/Asbestos Programs and Enforcement Branch (3WC32)  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Self Disclosure Agreement - AHERA  
Vaux High School ULCS #2130

Dear Ms. Townsend-McIntyre

As part of the School District of Philadelphia agreement, effective March 9, 2007 and amended January 18, 2008 with the United States Environmental Protection Agency (EPA), this letter is intended to transmit and certify the Corrective Action Plan (CAP) for the Vaux High School.

This Disclosure Report was written in accordance with the above noted agreement and the "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Federal Register 19618 (4/11/00) (the Policy).

As the Responsible Official, I hereby certify that the attached report entitled *CAP – Vaux High School ULCS #2130* submitted to EPA is true, accurate and complete in the form set forth in 40 C.F.R. § 270.11(d).

If you have any questions or comments please feel free to contact me or Ms. Elizabeth Gutman, Esq.

Sincerely,

A handwritten signature in cursive script, reading "Francine Locke".

Francine Locke, MS  
Director, Environmental Management & Services

Attachment 1 – *CAP – Vaux High School ULCS #2130*

# SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN

Updated as of: May 9, 2008

Facility Name: Vaux High School #2130  
Facility Address: 2300 W. Master Street, Philadelphia, PA 19121  
Date of Audit: 03/28/08  
Date CAP due to EPA: 5/26/08

| Finding Number   | Regulatory Citation          | Finding  | Corrective Action   | Corrective Action Status (include date when closed)   | Preventative Measure  | Preventative Measures Status (include date when closed)   | Extension Filed (Y/N) | Exhibit Reference | Approximate Cost to Close Finding | Potential Reduction of Pollutants *INCLUDE AMT OF OIL AFFECTED BY SPCC ISSUES - ALSO |
|--|------------------------------|--|---|---|---|---|-----------------------|-------------------|-----------------------------------|--|
| <b>ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart E</b> |                              |  |   |   |   |   |                       |                   |                                   |  |
| 1  | (40 CFR § 763.85(b))         | The school is required to complete 3 Year Reinspections. Minor data gaps were identified following the 2001 and 2004 - 3 Year Reinspections, ranging from 1 - 2 months   | The school must complete the Reinspections every 3 years. This is a historical finding as the school can not complete missing data gaps.  | Historical finding. Corrective Action can not be completed.   | A compliance calendar should be established and implemented to ensure the timely completion of the 3 Year Reinspections.  | <b>In Progress</b> - A draft compliance calendar was created by URS for the tracking of the 3 Year Reinspections and is currently being reviewed by the School District.  | N                     | 1                 | N/A                               | Recordkeeping violation  |
| 2  | (40 CFR § 763.85(b)(1)(vii)) | The regulations require that the 3 Year Reinspections records be updated within 30 days of the inspection. The most recent Reinspection Report is dated November 2006 and was available for review at the central file and the school building, however it was recently printed/distributed and was not completed within the required 30 day time frame from the inspection date in November 2006. | The 3 Year Reinspection records must be updated within 30 days of the actual inspection. This is a historical finding.  | Historical finding. Corrective Action can not be completed.   | A compliance calendar should be established and implemented so that the 30 day update can be tracked by the personnel in the central office for the next 3 Year Reinspection in 2009. | <b>In Progress</b> - A draft compliance calendar was created by URS for the 30 day tracking of the inspections and is currently being reviewed by the School District.  | N                     | 2                 | N/A                               | Recordkeeping violation  |
| 3  | (40 CFR § 763.94)(d)         | The school is required to complete 6 Month Periodic Surveillance Inspections. Varied data gaps exist between 6 Month Periodic Surveillance Inspections 1990-2007, ranging from 1-16 months.  | The school must complete Periodic Surveillance Inspections every 6 months. This is a historical finding as the school can not complete past missed inspections.   | Historical finding. Corrective Action can not be completed.   | A compliance calendar should be established and implemented to ensure the timely completion of the 6 Month Periodic Surveillance Inspections.   | <b>In Progress</b> - A draft compliance calendar was created by URS tracking the 6 Month Inspections and is currently being reviewed by the School District.  | N                     | 3                 | N/A                               | Recordkeeping violation  |
| 4  | (40 CFR § 763.94)            | The regulations require the school to maintain all Operations and Maintenance (O&M) records, only partial records were found at the school.  | Prepare copies of the missing O&M records and distribute to the administration office for inclusion in the management plan. The following reports were not found at the school.<br>USA 07-010001-200 8/8/07<br>USA 07-010001-207 9/11/07<br>USA 07-010001-101 5/8/07<br>USA 06-010001-331 12/5/06<br>USA 05-010001-240 7/8/05<br>USA 05-010001-383 12/6/05<br>Synertech 010-2656 12/13/06<br>USA 06-010001-330 11/7/06<br>USA 05-010001-384 11/26/05<br>USA 05-01-0001-195 8/12/04<br>Synertech 010-2759-9<br>Synertech 010-2090 11/30/03 | <b>Closed 5/9/08</b> - Copies of the missing response actions were prepared by the School District and distributed to the School for their records. | A letter should be sent to all school administrators reminding them of the AHERA record keeping procedures and the importance of maintaining all asbestos documentation.              | <b>Closed 5/9/08</b> -The missing response action reports were submitted with a letter titled "AHERA Compliance Update Reports" from the Office of Capital Programs regarding the importance of maintaining these reports with the management plan records. | N                     | 4                 | \$600                             | Recordkeeping violation  |

| Finding Number | Regulatory Citation      | Finding   | Corrective Action   | Corrective Action Status (include date when closed)   | Preventative Measure  | Preventative Measures Status (include date when closed)  | Extension Filed (Y/N) | Exhibit Reference | Approximate Cost to Close Finding | Potential Reduction of Pollutants *INCLUDE AMT OF OIL AFFECTED BY SPCC ISSUES - ALSO |
|----------------|--------------------------|---|---|---|---|--|-----------------------|-------------------|-----------------------------------|--|
| 5              | (40 CFR § 763.93 (g)(3)) | The school is required to maintain copies of previous reinspection reports. The 1992 and 1994 - 3 Year Reinspection Reports were not found at the school. | Prepare a copy from the central file and send to the school . | <b>Closed 5/9/08</b> - Copies of the missing reinspection reports were prepared by the School District and distributed to the School for their records. | Include notification letter instructing the principal to maintain with the other files. | <b>Closed 5/9/08</b> -The missing reinspection reports were submitted with a letter titled "Mandated EPA AHERA Documents" from the Office of Capital Programs regarding the importance of maintaining these reports with the management plan records | N                     | 5                 | \$400                             | Recordkeeping violation  |
|                |                          |   |   |   |   |  |                       |                   |                                   |  |
|                |                          |   |   |   |   |  |                       |                   |                                   |  |
|                |                          |   |   |   |   |  |                       |                   |                                   |  |



School District of Philadelphia  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

May 7, 2008

Ms. Sandra Ruffin-Pearson  
Vaux School  
2300 W. Master Street  
Philadelphia, PA 19121

Re: Asbestos Hazard Emergency Response Act (AHERA) Environmental Compliance Audit  
Documentation Related to Corrective Action Plan

Dear Ms. Ruffin-Pearson:

Following the AHERA Environmental Compliance Audit conducted at the Vaux School on March 27, 2008 the attached documents have been prepared for inclusion into the AHERA environmental management plan at your school and at the Environmental Library located at 440 N. Broad Street.

**The following documents were prepared for the Vaux School and must be kept with the AHERA environmental management plan records:**

Exhibit 4 –Response Action Reports not found at the school during the audit

Exhibit 5 – The 1992 and 1995 Reinspection Reports not found at the school during the audit

**School Principal:**

*secretary*  
Print Name:

Sign Name:

Date:

*Cheryl Henderson*

*Cheryl Henderson*

*5/9/08*

**Witnessed by:**

Title:

Print Name:

Sign Name:

Date:

*URS*

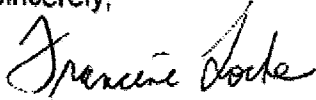
*Brian Joseph*

*Brian Joseph*

*5/9/08*

If you have any questions or comments, please feel free to contact Francine Locke at 215-400-4750 or Jerry Junod at 215 400-6738.

Sincerely,

A handwritten signature in cursive script that reads "Francine Locke". The signature is written in black ink and is positioned below the word "Sincerely,".

Francine Locke, MS  
Director, Environmental Management & Services

**School District of Philadelphia**  
**Asbestos Hazard Emergency Response Act (AHERA)**  
**Compliance Audit**

**Principal Interview Form**

The School District of Philadelphia (School District) and the U.S. Environmental Protection Agency, Region III (EPA) entered into a Self-Audit/Self Disclosure Agreement. The purpose of the agreement is to gauge the School District's compliance with the Asbestos Hazard Emergency Response Act (AHERA) requirements for your school/ facility.

The School District obtained the services of URS Corporation (URS) to conduct the AHERA environmental compliance audit. The audit will focus on the compliance of general information, inspections and reinspections, response actions, operations and maintenance, periodic surveillance, and notifications. This document acknowledges that all environmental documents relevant to the building asbestos management plan have been made available to URS at the time of the audit.

|                          |                         |
|--------------------------|-------------------------|
| <b>School/ Facility:</b> | Vaux Junior High School |
| <b>Address:</b>          | 2300 W. Master Street   |
| <b>Date of Audit:</b>    | 3/27/08                 |

**School Principal:**

**Print Name:** Sandra Ruffin-Reason

**Sign Name:** Sandra Ruffin-Reason

**Date:** March 28, 2008